UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY AVERAGE WHOLESALE PRICE LITIGATION

MDL No. 1456

Civil Action: 01-CV-12257-PBS

THIS DOCUMENT RELATES TO: ALL ACTIONS

Judge Patti B. Saris

MOTION TO FILE KLINE & SPECTER, P.C.'S REPLY TO LEAD COUNSEL'S OPPOSITION TO THE WILLIAMS MOTION TO MODIFY LEAD COUNSEL'S ALLOCATION OF FEES TO INCLUDE TIME AND EXPENSE INCURRED IN STATE COURT ACTIONS

The undersigned respectfully moves the Court for leave to file the reply memorandum and Exhibits A-N in support of the Motion to Modify Lead Counsel's Allocation of Fees to Include Time and Expense Incurred in State Court Actions.

WHEREFORE, the undersigned respectfully moves for leave to file the pleadings attached hereto, as requested herein, and any and all other relief the Court deems just and proper.

Dated: January 5, 2012

Shanin Specter, Esquire Kila Baldwin, Esquire Kline & Specter, P.C.

1525 Locust Street, 19th Floor Philadelphia, PA 19102-3712

CERTIFICATE OF SERVICE

I hereby certify that on this date, January 5, 2012, MOTION TO FILE KLINE & SPECTER, P.C.'S REPLY TO LEAD COUNSEL'S OPPOSITION TO THE WILLIAMS MOTION TO MODIFY LEAD COUNSEL'S ALLOCATION OF FEES TO INCLUDE TIME ANDEXPENSE INCURRED IN STATE COURT ACTIONS was duly filed with the Court through ECF and served on all counsel of record, via Lexis/Nexis File & Serve.

/s/ Barbara Carberry